Decomp	Decomposition of Sub-Process: 1. Schools certify application									
Core Bu	Core Business Process: FFEL Origination, Disbursement, Repayment and Collection Process									
	Scenario Section				Business Priority Possible Options Section			Options		
Failure Source	Threat/Failure Scenario	Impact/End Result	Earliest Failure Date	Business Priority Impact Risk Priority Rating Rating Rating		•	Risk Mitigation Options	High-Level Contingency Options		
School System	The ability for a school to certify an application fails.	Disbursements cannot be made to students.	Spring 1999	High	Undete rmined	High	To mitigate the risk that disbursements cannot be made to students, ED would ensure that:  Schools implement alternative software products.  Schools process paper loan applications.	If disbursements cannot be made to students ED would institute the following contingencies:  Implement alternative software products.  Process paper loan applications.		

_	Decomposition of Sub-Process:  2. Schools transmit application  Core Business Process:  FFEL Origination, Disbursement, Repayment and Collection Process									
	Scenario Section					iority 1	Possible Options			
Failure Source	Threat/Failure Scenario	Impact/End Result	Earliest Failure Date	Bu Impact Rating	usiness Pri Risk Rating	ority Priority Rating	Risk Mitigation Options	High-Level Contingency Options		
School System/ Telecom	The ability for schools to transmit applications fails.	Disbursements are not made to students.	Spring 1999	High	Undete rmined	High	To mitigate the risk that disbursements are not made to students, ED would use alternative telecommunication options (tapes, diskettes, etc.).	If disbursements are not made to students, ED would institute the following contingencies:  Require schools to send paper applications to the Department. Require GAs to process paper applications. Implement alternative telecommunication methods.		

_	Decomposition of Sub-Process:  3. GA guarantees loans  Core Business Process: FFEL Origination, Disbursement, Repayment and Collection Process										
	Scena	ario Section		Business Priority Section			Possible Options				
Failure Source	Threat/Failure Scenario	Impact/End Result	Earliest Failure Date	Impact Rating	usiness Pri Risk Rating		Risk Mitigation Options	High-Level Contingency Options			
GA System	The ability of GA's to guarantee loans fails.	Disbursements are not made to students.	Spring 1999	Low	Undete rmined	Low	To mitigate the risk that disbursements are not made to students, ED would:  Blanket certifications for lenders to bypass GA failures. Recommend other GA's guarantee loans.	If disbursements are not made to students, ED would institute the following contingencies:  Blanket certifications for lenders to bypass GA failures. Recommend other GA's guarantee loans. ED would guarantee loans (FISL-like)			

_	Decomposition of Sub-Process:  1. GA transmits guarantee								
Core Bu	Core Business Process: FFEL Origination, Disbursement, Repayment and Collection Process								
	Scenario Section					iority 1	Possible Options		
Failure Source	Threat/Failure Scenario	Impact/End Result	Earliest Failure Date	Bu Impact Rating	usiness Pri Risk Rating	ority Priority Rating	Risk Mitigation Options	High-Level Contingency Options	
GA System/ Comm	GA transmits guarantee to school and lender fails.	Disbursements are not made to students.	Spring 1999	Low	Undete rmined	Low	To mitigate the risk that disbursements are not made to students, ED would:  Require GA's to implement alternative telecommunication options.  Require GA's to implement blanket certifications for lenders to bypass a GA failure.	In the case that disbursements are not made to students, ED would institute the following contingencies:  Require GA's to implement alternative telecommunication options. Require GA's to implement blanket certifications for lenders to bypass GA failure. Require other GAs to guarantee loans. ED guarantees loans (FISL-like).	

Loan Origination - 30 days

-	oosition of Sub-Process usiness Process:	s: 2. Lender perf FFEL Origination				and Colle	ection Process		
	Scen	ario Section		Bus	siness Pr Section	_	Possible Options		
Failure Source	Threat/Failure Scenario	Impact/End Result	Earliest Failure Date	B Impact Rating	•		Risk Mitigation Options	High-Level Contingency Options	
Lender System	A lender's ability to perform PLUS credit checks fails.	Disbursements are not made to students.	Spring 1999	Low	Undete rmined	Low	To mitigate the risk that disbursements are not made to students, ED would:  • Move as many Spring 2000 disbursements as possible to Fall 1999.  • Ensure schools could certify loans for eligible students for their maximum loan amounts.  • Ensure schools could schedule second semester disbursements to Dec. 1999 (liability waiver required).  • Ensure schools could expand the preferred lender lists to bypass a lender failure.  • Ensure GAs expand lender participation agreements to bypass a lender failure.  • Ensure lenders to use alternative lender disbursement agents to bypass a disbursement agent failure.  • Ensure schools arrange for lines of credit in order to issue	In the case that disbursements are not made to students, ED would institute the following contingencies:  Non-failure lenders to disburse loans. Implement SLMA Lender of Last Resort program to disburse loans to bypass lender failures. Implement GA Lender of Last Resort program to disburse loans to bypass lender failures. Use Direct Loan program to bypass lender failures.	

short-term loans to students.

Loan Origination - 30 days

Decomp	Decomposition of Sub-Process: 3. Lender obtains signed promissory note										
Core B	isiness Process:	FFEL Origination	on, Disburse	ment, Re	payment	and Colle	ction Process				
	Scena	ario Section		Bus	Business Priority Possil Section			e Options			
Failure Source	Threat/Failure Scenario	Impact/End Result	Earliest Failure Date	Impact Rating	usiness Pri Risk Rating	Priority Rating	Risk Mitigation Options	High-Level Contingency Options			
Lender System	The lender's ability to obtain a signed promissory note fails.	Disbursement are not made to students.	Spring 1999	High	Undete rrmine d	Low	To mitigate the risk that disbursements are not made to students, ED would:  • Move as many Spring 2000 disbursements as possible to Fall 1999 • Ensure schools could certify loans for eligible students for their maximum loan amounts • Ensure schools expand preferred lender lists to bypass a lender failure. • Ensure GAs to expand lender participation agreements to bypass a lender failure. • Ensure lenders use alternative lender disbursement agents to bypass a disbursement agent failure.	In the case that disbursements are not made to students, ED would institute the following contingencies:  • Non-failure lenders to disburse loans to students. • Implement SLMA Lender of Last Resort programs to disburse loans to bypass lender failures. • Implement GA Lender of Last Resort program to disburse loans to bypass lender failures.			

Use Direct Loan

lender failures.

program to bypass

Ensure schools could cut spring semester refund checks

2000 enrollment is confirmed.

to students in December 1999

and hold until student's spring

Ensure schools arrange for lines of credit in order to issue short-term loans to students.

Decomp	Decomposition of Sub-Process:  4. Lender approves loan										
Core B	usiness Process:	FFEL Originatio	n, Disburs	Business Priority			ection Process  Possible Options				
	Stella	irio section		Dus	Section 1 district Space						
Failure Source	Threat/Failure Scenario	Impact/End Result	Earliest Failure Date	Impact Rating	usiness Pri Risk Rating	Priority Rating	Risk Mitigation Options	High-Level Contingency Options			
Lender System	The lender's ability to approve loans fails.	Disbursement are not made to students	Spring 1999	High	Undete	Low	To mitigate the risk that disbursements are not made to students, ED would:  • Move as many Spring 2000 disbursements as possible to Fall 1999. • Ensure schools could certify loans for eligible students for their maximum loan amounts. • Ensure schools expand preferred lender lists to bypass a lender failure. • Ensure GA's expand lender participation agreements to bypass a lender failure. • Ensure lenders use alternative lender disbursement agents to bypass disbursement agent failure. • Ensure schools arrange for lines of credit in order to issue short-term loans to students.	In the case that disbursements are not made to students, ED would institute the following contingencies:  Non-failure lenders to disburse loans to students.  Implement SLMA Lender of Last Resort programs to disburse loans to bypass lender failures.  Implement GA Lender of Last Resort program to disburse loans to bypass lender failures.  Use Direct Loan program to bypass lender failures.			

Decomp	Decomposition of Sub-Process:  1. Lender disburses funds to school  Compared to the compared t									
Core B	usiness Process: Scena	FFEL Originatio	n, Disburse	ment, Repayment and Colle  Business Priority  Section			Possible Options			
Failure Source Lender System	The lender ability to disburse funds fails.	Impact/End Result  Disbursements are not made to schools	Earliest Failure Date Fall 1999	Bu Impact Rating High	usiness Pri Risk Rating Undete rmined		Risk Mitigation Options  To mitigate the risk that disbursements are not made to students, ED would:  • Move as many Spring 2000 disbursements as possible to Fall 1999. • Ensure schools could certify loans for eligible students for their maximum loan amounts. • Ensure schools expand preferred lender lists to bypass a lender failure. • Ensure schools receive regulatory relief to credit student's account earlier than currently allowed (liability waiver). • Ensure schools expand preferred lender lists to bypass lender failures. • Ensure GAs expand lender participation agreements to bypass lender failures. • Ensure lenders use alternative disbursement agents to bypass disbursement agent failures. • Ensure schools arrange for lines of credit in order to issue short-term loans to students.	In the case that disbursements are not made to students, ED would institute the following contingencies:  Non-failure lenders to disburse loans to students.  Implement SLMA Lender of Last Resort programs to disburse loans to bypass lender failures.  Implement GA Lender of Last Resort program to disburse loans to bypass lender failures.  Use Direct Loan program to bypass lender failures		

Decomposition of Sub-Process: 2. Lender transmits disbursement data								
Core Bu	siness Process:	FFEL Originatio	n, Disburs	sement, R	epaymer	t and Col	lection Process	
	Scena	rio Section		Bus	iness Pr	Options		
Failure Source Lender System	Threat/Failure Scenario  The lender ability to transmit disbursement data fails.	Impact/End Result  Disbursements are not made to schools.	Earliest Failure Date Fall 1999	Bu Impact Rating High	Section usiness Pri Risk Rating Undete rmined		Risk Mitigation Options  To mitigate the risk that disbursements are not made to students, ED would:  • Move as many Spring 2000 disbursements as possible to Fall 1999. • Ensure schools could certify loans for eligible students for their maximum loan amounts. • Ensure schools expand preferred lender lists to bypass a lender failure. • Ensure schools receive regulatory relief to credit student's account earlier than currently allowed (liability waiver). • Ensure schools expand preferred lender lists to bypass lender failures. • Ensure Gas expand lender participation agreements to bypass lender failures. • Ensure lenders use alternative disbursement agents to bypass disbursement agent failures. • Ensure schools arrange for lines of credit in order to issue	High-Level Contingency Options  In the case that disbursements are not made to students, ED would institute the following contingencies:  Schools could use the GA's disbursement data if it is available. Schools could use its own anticipated disbursement data and reconcile with lender when a failure is corrected. Schools could arrange to issue lines of credit to allow short-term loans to students.

_	Decomposition of Sub-Process:  3. School credits student accounts  FFEL Origination, Disbursement, Repayment and Collection Process										
Core Bi	Scenario Section					iority	Possible Options				
Failure Source	Threat/Failure Scenario	Impact/End Result  Student's account not	Earliest Failure Date Fall 1999	Impact Rating	Section Isiness Pri Risk Rating	ority Priority Rating	Risk Mitigation Options	High-Level Contingency Options  In the case that disbursements			
School System	The school ability to credit student accounts fails.	Student's account not credited.	Fall 1999	High	Undete	High	To mitigate the risk that disbursements are not made to students, ED would:  • Move as many Spring 2000 disbursements as possible to Fall 1999. • Ensure schools could certify one-semester loans for students eligible for maximum loan amounts. • Ensure schools could schedule second semester disbursements to Dec. 1999 (liability waiver required). • Ensure schools could receive regulatory relief to credit student's account earlier than currently allowed (liability waiver). • Ensure schools could cut spring semester refund checks to students in December 1999 and hold until student's spring 2000 enrollment is confirmed. • Ensure schools arrange for lines of credit in order to issue short-term loans to students.	In the case that disbursements are not made to students, ED would institute the following contingencies:  • Allow schools to defer outstanding tuition bills. • Allow schools to arrange for lines of credit to issue short-term loans to students.			

Decomp	Decomposition of Sub-Process:  • School delivers loan proceeds									
Core B	ısiness Process:	FFEL Origination	on, Disburs	sement, R	epaymei	nt and Col	lection Process			
	Scena	rio Section		Bus	iness Pr Section	-	Possible Options			
Failure Source School	Threat/Failure Scenario School unable to	Impact/End Result Student does not receive	Earliest Failure Date Fall 1999	Bu Impact Rating High	Risk Rating Undete	ority Priority Rating High	Risk Mitigation Options  To mitigate the risk that	High-Level Contingency Options  In the case that disbursements		
System	deliver loan proceeds	loan proceeds			rmined		disbursements are not made to students, ED would:  Move as many Spring 2000 disbursements as possible to Fall 1999 Schools could certify onesemester loans for students eligible for maximum loan amounts Schools could schedule second semester disbursements to Dec. 1999 (liability waiver required) Schools could receive regulatory relief to credit student's account earlier than currently allowed (liability waiver) Schools could cut spring semester refund checks to students in December 1999 and hold until student's spring 2000 enrollment is confirmed Schools to arrange for lines of credit in order to issue short term loans to students	are not made to students, ED would institute the following contingencies:  Schools to defer outstanding tuition bills. Schools to arrange for lines of credit to issue short term loans to students.		

Decomp	Decomposition of Sub-Process:  1. Lender updates borrower status									
Core B	Core Business Process: FFEL Origination, Disbursement, Repayment and Collection Process									
	Scena	rio Section		Bus	iness Pr	iority	Possible	Options		
						1				
Failure	Threat/Failure Scenario	Impact/End Result	Earliest	Вι	isiness Pri	ority	Risk Mitigation Options	High-Level Contingency Options		
Source			Failure	Impact	Risk	Priority				
			Date	Rating	Rating	Rating				
Lender System	The lender's ability to update borrower status fails.	The borrower may not be placed in repayment or may be denied deferments or forbearance. The borrower may also be considered in default due to error.	1/3/2000	High	Undete rmined	High	To mitigate the risk that borrower status is not entered, ED would:  Require borrower servicing/payment histories to be archived on December 31, 1999 to allow continued servicing on most recent information.  Require lenders to make alternative servicing arrangements	In the case that the status of the borrower cannot be updated, ED would perform case-by-case liability waivers based on failures and impacts on the borrower.		

Decomp	osition of Sub-Process	: 2. Lender bills	/collects pa	yments f	rom bori	owers		
Core Bu	isiness Process:	FFEL Origination	n, Disburs	ement, R	epaymen	t and Coll	ection Process	
Scenario Section					iness Pr	iority	Risk Mitigati	on Options
					Section	1		
Failure	Threat/Failure Scenario	Impact/End Result	Earliest	Βι	isiness Pri	ority	Risk Mitigation Options	High-Level Contingency Options
Source			Failure	Impact	Risk	Priority		
			Date	Rating	Rating	Rating		
Lender System	The lender's ability to bill/collect payments from borrowers fails.	The borrower may be considered in default in error.	1/3/2000	High	Undete rmined	High	To mitigate the risk that the lender cannot bill/collect payments, ED would:  Require borrower servicing/payment histories be archived on December 31, 1999. Encourage lenders to make alternative servicing arrangements.	In the case that the status of the Lender cannot bill/collect payments, ED would perform case-by-case liability waivers based on the failure and impact on the borrower.

•	osition of Sub-Process							
Core Bu	isiness Process:	FFEL Origination	n, Disburs	ement, R	epaymei	nt and Coll	lection Process	
	Scenario Section				iness Pr	iority	Possible (	Options
					Section	n		
Failure	Threat/Failure Scenario	Impact/End Result	Earliest	Вι	isiness Pri	ority	Risk Mitigation Options	High-Level Contingency Options
Source			Failure	Impact	Risk	Priority		
			Date	Rating	Rating	Rating		
Lender System	The lender's ability to apply payments and/or accrue accurate interest fails.	The borrower may be considered in default in error or may have been assessed inaccurate interest accruals.	1/3/2000	High	Undete rmined	High	To mitigate the risk that the lender's ability to accrue payments or accrue accurate interest fails, ED would.  Require borrower servicing/payment histories be archived on December 31, 1999 to allow continued servicing with most recent information.  Allow lenders to make alternative servicing	In the case that the lender's ability to accrue payments or accrue accurate interest fails, ED would perform case-by-case liability waivers based on failures and impacts on the borrower.

_	Decomposition of Sub-Process:  4. Lender reports to credit bureau  Core Business Process:  FFEL Origination, Disbursement, Repayment and Collection Process									
Scenario Section				Bus	iness Pr	iority	Possible Options			
					Section	l				
Failure	Threat/Failure Scenario	Impact/End Result	Earliest	Ві	Business Priority		Risk Mitigation Options	High-Level Contingency Options		
Source			Failure	Impact	Risk	Priority				
			Date	Rating	Rating	Rating				
Lender	The lender's ability to	The borrower may have	1/3/2000	High	Undete	High	To mitigate the risk that the	In the case that the lender's		
system	report to credit bureau	inaccurate credit bureau			rmined		lender's	reporting to the credit bureau		
	fails.	information.					reporting to the credit bureau fails,	fails,		
							ED would allow lenders to make	ED would perform case-by-case		
							alternative servicing	liability waivers based on		
							arrangements.	failures and impacts on the		
								borrower.		

Decomp	Decomposition of Sub-Process: 5. Lender requests pre-claim assistance										
Core Bu	Core Business Process: FFEL Origination, Disbursement, Repayment and Collection Process										
Scenario Section					iness Pri	iority	Possible Options				
						l					
Failure	Threat/Failure Scenario	Impact/End Result	Earliest	Вι	Business Priority		Risk Mitigation Options	High-Level Contingency Options			
Source			Failure	Impact	Impact Risk Priority						
			Date	Rating	Rating	Rating					
Lender	The lender's ability to	The borrower may be denied	1/3/2000	High	Undete	High	To mitigate the risk that the	In the case that the lender's			
System	request pre-claim	default prevention activities.			rmined		lender's	ability to request pre-claims			
	assistance fails.						ability to request pre-claims	assistance fails, ED would			
							assistance fails, ED would	perform			
							allow lenders to make alternative	case-by-case liability waivers			
							servicing arrangements.	based on failures and impacts on			
								the borrower.			

Guaranty Agency Repayment and Collection - 90 Days

-	osition of Sub-Process	: 1. GA updates			enavmer	nt and Col	lection Process		
	Scenario Section					iority	Possible Options		
Failure Source	Threat/Failure Scenario	Impact/End Result	Earliest Failure Date	Section  Business Priority Impact Risk Priority Rating Rating Rating			Risk Mitigation Options	High-Level Contingency Options	
GA System	A GA's ability to update a borrower's status fails.	A borrower may be denied access to rehabilitation programs.	1/3/2000	Med	Undete rmined	Med	To mitigate the risk that the GA's ability to update a borrower's status fails, ED would review GA's Y2K plans submitted as of March 1999. Assessments will be made and the following risk options may be exercised:  Transfer some or all GA services to another organization. Require the mandatory assignment of defaulted accounts to ED. Increase the use of collection agencies. Require borrower servicing/payment histories to be archived on December 31, 1999 to allow continued servicing on most recent information. Allow GAs to use alternative system servicing	In the case that the GA's ability to update a borrower's status fails, ED would institute the following contingencies:  Transfer services to another GA. Require mandatory assignments to ED. Place all accounts with collection agencies.	

arrangements.

Guaranty Agency Repayment and Collection - 90 Days

Core B	usiness Process:	FFEL Origination	on, Disburs	sement, R	epaymer	t and Col	lection Process	
	Scenario Section					iority 1	Possible Options	
Failure Source	Threat/Failure Scenario	Impact/End Result	Earliest Failure Date	Bu Impact Rating	isiness Pri Risk Rating		Risk Mitigation Options	High-Level Contingency Option
GA System	A GA's ability to bill/collect payments from borrowers fails.	The borrower's repayment status may be inaccurate.	1/3/2000	Med	Undete rmined	Med	To mitigate the risk that the ability of the GA's to bill/collect payments from borrowers fails, ED would review GA's Y2K plans submitted as of March 1999. Assessments will be made and the following risk options may be exercised:  Transfer some or all GA services to another organization.  Require the mandatory assignment of defaulted accounts to ED.  Increase the use of collection agencies.  Require borrower servicing/payment histories to be archived on December 31, 1999 to allow continued servicing on most recent information.  Allow GAs to use alternative system servicing	In the case that the ability of the GA's to bill/collect paymer from borrowers fails, ED would institute the following contingencies:  Transfer services to another GA. Require mandatory assignments to ED. Place all accounts with collection agencies.

arrangements.

Core Business Process VIII 188-FFEL Origination, Disbursement, Repayment and Collection Process Risk Mitigation and Contingency Options Matrix Minimum Acceptable Level of Service:

Guaranty Agency Repayment and Collection - 90 Days

Decomp	Decomposition of Sub-Process: 3. GA apply payments/accrue accurate interest to borrower account									
Core Business Process: FFEL Origination, Disbursement, Repayment and Collection Process										
	Scena	rio Section		Business Priority		Possible Options				
				Section						
Failure	Threat/Failure Scenario	Impact/End Result	Earliest	Business Priority		Risk Mitigation Options	High-Level Contingency Options			
Source			Failure	Impact Risk Priority						
			Date	Rating Rating Ratin	g					

Guaranty Agency Repayment and Collection - 90 Days

GA	A GA's ability to apply	The borrower's repayment	1/3/2000	Med	Undete	Med	To mitigate the risk that a GA's	In the case that a GA's
System	payments or accrue	status may be inaccurate or			rmined		ability to apply payments or accrue	ability to apply payments or
	accurate interest to a	may have been assessed					accurate interest to a borrower's	accrue
	borrower's account	inaccurate interest accruals.					account fails, ED would review	accurate interest to a borrower's
	fails.						GA's Y2K plans submitted as of	account fails, ED would
							March 1999. Assessments will be	institute the following
							made and the following risk	contingencies:
							options	
							may be exercised:	<ul> <li>Transfer services to</li> </ul>
							<ul> <li>Transfer some or all GA</li> </ul>	another GA.
							services to another	Require mandatory
							organization.	assignments to ED.
							<ul> <li>Require the mandatory</li> </ul>	<ul> <li>Place all accounts with</li> </ul>
							assignment of defaulted	collection agencies.
							accounts to ED.	
							<ul> <li>Increase the use of collection</li> </ul>	
							agencies.	
							<ul> <li>Require borrower</li> </ul>	
							servicing/payment histories to	
							be archived on December 31,	
							1999 to allow continued	
							servicing on most recent	
							information.	
							<ul> <li>Allow GAs to use alternative</li> </ul>	
							system servicing	
							arrangements.	

Guaranty Agency Repayment and Collection - 90 Days

Decompo	sition of Sub-Process:	4. GA reports	s to credit b	ureau					
Core Bus	siness Process:	FFEL Originati	on, Disburs	ement, R	lepaymei	nt and Col	lection Process		
	Scena	rio Section		Bus	iness Pr Section	•	Possible Options		
Failure Source	Threat/Failure Scenario	Impact/End Result	Earliest Failure Date	Impact Rating	isiness Pri Risk Rating	Priority Rating	Risk Mitigation Options	High-Level Contingency Options	
GA System	A GA's ability to report to a credit bureau fails.	The borrower may have inaccurate credit bureau information.	1/3/2000	Med	Undete rmined	Med	To mitigate the risk that a GA's ability to report to a credit bureau fails, ED would review GA's Y2K plans submitted as of March 1999. Assessments will be made and the following risk options may be exercised:  Transfer some or all GA services to another organization.  Require the mandatory assignment of defaulted accounts to ED.  Increase the use of collection agencies.  Require borrower servicing/payment histories to be archived on December 31, 1999 to allow continued servicing on most recent information.  Allow GAs to use alternative system servicing arrangements.	In the case that a GA's ability to report to a credit bureau fails, ED would institute the following contingencies:  Transfer services to another GA. Require mandatory assignments to ED. Place all accounts with collection agencies.	

Guaranty Agency Repayment and Collection - 90 Days

Decomp	Decomposition of Sub-Process: 5. GA remits ED's share of collections											
Core B	ısiness Process:	FFEL Originatio	n, Disburse	ment, Re	payment	and Colle	ction Process					
	Scena	ario Section		Bus	siness Pr Section	=	Possible Options					
Failure Source	Threat/Failure Scenario	Impact/End Result	Earliest Failure Date	Bu Impact Rating	usiness Pri Risk Rating	ority Priority Rating	Risk Mitigation Options	High-Level Contingency Options				
GA System	A GA's ability to remit ED's share of collections fails.	ED may have outstanding collections.	1/3/2000	Med	Undetermined	Med	To mitigate the risk that the GA's ability to remit ED's share of collections fails, ED would review GA's Y2K plans submitted as of March 1999. Assessments will be made and the following risk options may be exercised:  Transfer some or all GA services to another organization.  Require the mandatory assignment of defaulted accounts to ED.  Increase the use of collection agencies.  Require borrower servicing/payment histories to be archived on December 31, 1999 to allow continued servicing on most recent information.  Allow GAs to use alternative system servicing arrangements	In the case that the GA's ability to remit ED's share of collections fails, ED would institute the following contingencies:  Transfer services to another GA. Require mandatory assignments to ED. Place all accounts with collection agencies.				